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To: (1)ACICS President & CEO Michelle Edwards

(2) Stratford University President Dr. Richard Shurtz

## VIA EMAIL & FIRST CLASS MAIL

Re: The American Stratford University in Erbil

December 27, 2019

Dear Ms. Edwards & Dr. Shurtz:

My law firm is legal counsel for Dr. Saqi Barzani and International Academic City, LLC (IAC). I write to you with regard to ACICS's December 19, 2019 Show-Cause Directive letter to Stratford regarding, amongst other matters, the alleged lack of accreditation of The American Stratford University in Erbil. (hereinafter "the Erbil campus").

IAC entered into an affiliation agreement with Stratford University in July 2018. In this agreement and in multiple other communications in 2018 and 2019, Stratford promised to maintain its accreditation with ACICS and to establish a fully accredited campus in Erbil. At all times since the parties entered into their relationship, Stratford University officially confirmed in the agreements and repeatedly affirmed that it maintained its accreditation with ACICS and had taken all necessary steps – as promised – to extend that accreditation to the Erbil campus.

Pursuant to the parties' agreement and acknowledgement, the Erbil campus is a division of IAC, and thus is wholly owned by IAC. Stratford University retains the rights to certain payments and

academic input under the agreement, but it does not possess the authority to dictate withdrawal of IAC's students, who have separately contracted with IAC independent of Stratford University or ACICS.

This letter is not intended to further escalate the outstanding issues between Stratford University and ACICS. However, my clients cannot stand by and allow interference with their existing students and contracts. My clients should not be penalized for acting in good faith based on representations made to them concerning the Erbil campus' proper accreditation with ACICS. For that reason, IAC and the American Stratford University at Erbil immediately and forthwith disassociates itself from Stratford University. In the spirit of mutual cooperation, IAC requests 40 days from today's date to transition the Erbil campus away from Stratford University. During this time, there must be no notification sent to the students or their parents or attempts to force them to resign from their classes. Likewise, there must be no posting on the Internet from either Stratford or ACICS regarding IAC, American Stratford University in Erbil or Dr. Barzani. There can be no interference with students, faculty, community or regulatory bodies of the American Stratford University in Erbil.

We believe that this 40-day period will provide sufficient time for IAC to completely transition from Stratford and ensure the well-being of the students, faculty and staff. I also note that the 40-day window falls well within the time parameters for the show cause directive.

In light of the type of relationship between Stratford University and IAC, and the repeated failure of Stratford University to meet its affiliate obligations under said agreement, failure to meet this simple request may lead to significant escalation of this matter.

We strongly feel that ACICS' proposed adverse actions against the campus in Erbil, as contained in ACICS's December 19 letter, is both unfair and premature, and did not take into consideration the type of relationship / contractual agreements between Stratford University and IAC. Nor did it account for the wellbeing of the students enrolled in this campus, faculty, staff and the community of the American Stratford University in Erbil. Likewise, it also did not consider the financial implication of the proposed publicity and unjustified adverse action and the impact on IAC.

Having said that, we again request this short 40-day transition period. The disaffiliation with Stratford University will satisfy ACICS's concerns, and allows IAC's students to continue their academic training. We trust this mutually beneficial solution will be accepted. I look forward to your response (or that of your legal counsel) at your earliest possible convenience.

Sincerely,

/s/ Stephen J. Stine, Esq.